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Attorneys for Defendant Basecamp, LLC

Attorneys for Movant Apple Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FILED

Sep 03 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

Apple Inc.,

Movant,

vs.

Basecamp, LLC,

Defendant.

Case No. 3:21-mc-80187-YGR (TSH)

**STIPULATION AND ~~PROPOSED~~ ORDER
REGARDING WITHDRAWAL OF APPLE
INC.'S MOTION TO COMPEL**

Pursuant to Civil Local Rule 7-12, Movant Apple Inc. and Defendant Basecamp, LLC, by and through their respective counsel, hereby agree as follows:

WHEREAS, in light of the Settlement Agreement and related motion for preliminary approval filed in *Cameron v. Apple Inc.*, No. 4:19-mc-03074-YGR (TSH), Apple has elected to withdraw its motion to compel in this action against Basecamp;

WHEREAS, Apple reserves all rights to pursue additional documents in the future without reservation;

WHEREAS, Basecamp similarly reserves all rights to object to such pursuit, including but not limited to on grounds of relevance, privilege, and timeliness;

1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that Apple
2 withdraws the motion to compel pending in this action. The clerk shall enter an order of dismissal
3 in due course.

4
5 **SO STIPULATED:**

6 DATED: September 3, 2021.

HUESTON HENNIGAN LLP

8
9 /s/ Douglas J. Dixon

Douglas J. Dixon, State Bar No. 275389

Joseph A. Reiter, State Bar No. 294976

William Larsen, State Bar No. 314091

11 *Attorneys for Defendant Basecamp, LLC*

12
13
14 DATED: September 3, 2021.

MCDERMOTT WILL AND EMERY LLP

16 /s/ Nicole L. Castle

Nicole Castle (*pro hac vice*)

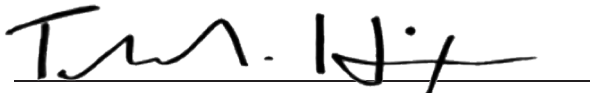
John Calandra (*pro hac vice*)

Michael R. Huttenlocher (*pro hac vice*)

19 *Attorneys for Movant Apple Inc.*

20 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

21 DATED: Sept. 3, 2021.

22
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25 Thomas S. Hixson

26 United States Magistrate Judge

DECLARATION REGARDING CONCURRENCE

I, Douglas J. Dixon, am the ECF user whose identification and password are being used to file this **STIPULATION AND [PROPOSED] ORDER REGARDING WITHDRAWAL OF APPLE INC.'S MOTION TO COMPEL**. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all of the signatories listed above have concurred in this filing.

DATED: September 3, 2021.

/s/ Douglas J. Dixon